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6 Attorneys for Defendant
JOSE FERNANDO GOMEZ-MOREIRA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JOSE FERNANDO GOMEZ-
MOREIRA,

15 Defendant.
16

Case No. 1:20-cr-00151-NONE-SKO

**STIPULATION TO CONTINUE CHANGE
OF PLEA**

Date: June 4, 2021
Time: 1:00 p.m.
Judge: Hon. Dale A. Drozd

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18 The parties, through their respective counsel, Laura Withers, Assistant United States
19 Attorney, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender,
20 counsel for the defendant, Jose Fernando Gomez-Moreira, hereby stipulate and jointly move this
21 Court to continue Mr. Gomez-Moreira's status conference from June 4, 2021 to June 10, 2021.

22 The parties have reached a tentative plea agreement, however defense counsel requires
23 additional time for translation of documents and to finalize the plea agreement.

24 The parties request this continuance with the intention of conserving time and resources
25 for both the parties and the Court. The parties agree that the delay resulting from the continuance
26 shall be excluded in the interests of justice, including but not limited to, the need for the period
27 of time set forth herein for effective defense preparation, defense investigation, and plea
28 negotiation purposes pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

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Respectfully submitted,

McGREGOR SCOTT
United States Attorney

Dated: June 1, 2021

/s/ Laura Withers
LAURA WITHERS
Assistant U.S. Attorney

Dated: June 1, 2021

HEATHER E. WILLIAMS
Federal Defender


/s/ Benjamin A. Gerson
BENJAMIN A. GERSON
Assistant Federal Defender
Attorney for Defendant
JOSE FERNANDO GOMEZ-MOREIRA

ORDER

GOOD CAUSE APPEARING, the above stipulation to continue case 1:20-cr-00151 to June 10, 2021 is hereby accepted and adopted as the order of this Court.

IT IS SO ORDERED.

Dated: **June 1, 2021**


UNITED STATES DISTRICT JUDGE